

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Justin Craig, Task Force Officer (TFO) with the United States Secret Service (USSS),
being duly sworn, depose and state the following:

INTRODUCTION

1. Affiant makes this affidavit in support of a criminal complaint and arrest warrant. This affidavit is based upon information that Affiant has gained through training and experience, as well as upon information relayed by other individuals, including law enforcement officers. This affidavit is being submitted for the limited purpose of establishing probable cause to secure an arrest warrant. As a result, Affiant has not included every fact known in the investigation.

2. Affiant submits, as set forth below, that there is probable cause to believe that Bryan PERRY and others known and unknown has conspired with others to execute a scheme to defraud through the use of stolen identity documents and bank information in violation of Title 18, United States Code, Sections 1349 (Conspiracy to Commit Bank fraud), 1344 (Bank Fraud), and 1028A (Aggravated Identity Theft).

TRAINING AND EXPERIENCE

3. Affiant has been a Trooper with the Ohio State Highway Patrol (OSHP) for over fifteen years. Affiant is also a federally deputized TFO with the USSS. I am accordingly a “law enforcement officer” as defined by Fed. Crim. R. 41(a)(2)(C). During my career as a law enforcement officer, I have been recognized for various awards and/or commendations including, but not limited to, the following: The Ohio State Highway Patrol Criminal Patrol Efficiency Award, and The Ohio State Highway Patrol Post Trooper of the Year Award. I have

successfully completed the following training and seminars including, but not limited to: Basic Criminal Investigator's Training; Interviews and Interrogations; Wicklander – Zulawski Conference on Interview and Interrogation; Reid Conference on Interview and Interrogation; Crash Reconstruction and Analysis; Darknet and Cryptocurrency.

4. Affiant has investigated, or participated in the investigation of, the offenses including, but not limited to, the following: Vehicular Homicide; Aggravated Vehicular Homicide; Aggravated Vehicular Assault; Trafficking in Drugs; Receiving Stolen Property; Credit Card Fraud; Counterfeit Currency; and Weapons Violations. Over the course of my professional career, I have investigated, or been involved in the investigation of, approximately 300 criminal cases, including child exploitation, currency counterfeiting, bank fraud, firearms trafficking, and identity theft investigations, many of which have led to successful state and federal prosecutions.

PROBABLE CAUSE

5. During the late morning of September 14, 2022, OSHP Trooper Ann Malone reported to a disabled vehicle on the side of I-80 in Fulton County, Ohio. As Trooper Malone approached, she observed that the vehicle did not have a registration, but only a piece of paper with information written on it in the rear window. The driver of the vehicle, later identified as PERRY, appeared to be asleep, with a cell phone in his hand. PERRY provided inconsistent information regarding both his identity and the owner of the vehicle. PERRY provided a New York driver's license in the name A.D. with PERRY's photograph on the document, but New York driver records showed that A.D. was not the same person depicted. When a United States Border Patrol agent arrived with a mobile fingerprint machine, PERRY admitted his true

identity, as well as that there were additional fraudulent documents in the vehicle. The vehicle was searched and Trooper Malone discovered, among other items:

- a. A One Plus One cell phone with black case;
 - b. A silver iPhone;
 - c. Thirteen driver's licenses in various names from New York, Florida, Georgia, Connecticut, Missouri, and Utah, all depicting PERRY's photo;
 - d. Fourteen credit cards in various names, including some in the names of individuals contained in certain of the fraud driver's licenses;
 - e. A binder and paperwork containing names and bank accounts;
 - f. Two filled out checks and three blank checks with various payees and payors issued by Bayonne School Employees Federal Credit Union and JPMorgan Chase Bank; and
 - g. A user amount of apparent heroin and various pipes and needles.
6. Record inquiries reflect that JPMorgan Chase Bank is insured by the Federal Deposit Insurance Corporation and Bayonne School Employees Federal Credit Union is insured by the National Credit Union Share Insurance Fund.
7. Your affiant reported to the OSHP Swanton Post, reviewed the evidence obtained by Trooper Malone, and interviewed PERRY. PERRY stated that he had been recruited by an unknown male, Person 1, to cash checks and do "sales" for \$1,500 a day. PERRY recounted that he flew to Houston, where another man, Person 2, and unknown others, directed PERRY to enter a bank with a fraudulent identification card and withdraw funds. PERRY communicates with Person 2 using the Telegram encrypted messaging application.

8. PERRY stated that Person 2 lent PERRY's services to Person 3, who also engaged in the same scheme.

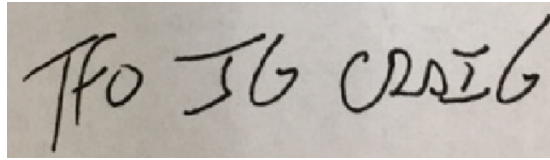
9. PERRY explained that as part of the scheme, Person 2, Person 3, and unknown conspirators provide PERRY with identification documents containing valid information belonging to victims, but with PERRY's photograph in the picture section. PERRY's co-conspirators obtain victim information from the Dark Web. PERRY is directed to go to banks where victims hold accounts and withdraw funds in amounts ranging from \$4,000 to \$10,000 at a time. PERRY has withdrawn funds at banks throughout the United States.

10. Your affiant submitted the thirteen fraudulent identification documents obtained from PERRY to the OSHP Intelligence Unit. Eleven of the thirteen documents were associated to real people.

11. Record checks revealed that PERRY was stopped on June 22, 2022, by the Pennsylvania State Police (PSP) in Delaware County, Pennsylvania while driving a vehicle bearing the registration of a different vehicle. PERRY presented a fraudulent Texas identification document to the PSP officer containing information from another individual. PERRY's vehicle was searched and a backpack containing numerous driver's licenses, a passport card, and credit cards containing information belonging to other individuals were recovered. The arresting PSP officer confirmed that the personal identifiers contained on the identification documents belonged to real people. The PSP officer reached out to the victims, who almost uniformly reported that they had been the victims of identity theft and that funds were stolen from their bank accounts. PERRY is currently subject to an active warrant out of Pennsylvania for various charges relating to the June incident.

CONCLUSION

12. Based on the facts stated above, Affiant submits that there is probable cause to believe that from in or around June of 2022 to September 14, 2022, in the Northern District of Ohio, Western Division, and elsewhere, Defendant Bryan PERRY and others, known and unknown, committed acts constituting violations of Title 18, United States Code, Sections 1349 (Conspiracy to Commit Bank fraud), 1344 (Bank Fraud), and 1028A (Aggravated Identity Theft).

A rectangular box containing a handwritten signature in black ink. The signature appears to read "TFO JG CRAIG".

Justin Craig, Task Force Officer
United States Secret Service

Sworn to via telephone on this 19th day of September, 2022
after submission by reliable electronic means.
Fed.R.Crim.P. 4.1 and 41(d)(3).

A handwritten signature in black ink, appearing to be "Darrell A. Clay".

Darrell A. Clay
United States Magistrate Judge